

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION

STEVES AND SONS, INC.,)
Plaintiff,)
v.)
JELD-WEN, INC.,)
Defendant.)
)

Civil Action No. 3:16-CV-00545-REP

DEFENDANT JELD-WEN, INC.'S PROPOSED JURY INSTRUCTIONS

Pursuant to the Court’s instruction during the January 22, 2018 Pretrial Conference, Defendant JELD-WEN, Inc. (“JELD-WEN”) respectfully submits its Proposed Jury Instructions, attached as Attachment A. JELD-WEN understands the Court to have encouraged the parties to conform the instructions to the applicable model instructions where available, and JELD-WEN has done so accordingly. For ease of the Court’s reference, JELD-WEN has bolded language in the instructions that is taken from the applicable model instruction except for including the names of the parties and other case-specific information from this action, leaving unbolded any other modifications or language that JELD-WEN additionally proposes.

Dated: January 26, 2018

Respectfully submitted,

JELD-WEN, Inc.

By counsel

/s/ Ryan T. Andrews

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CERTIFICATE OF SERVICE

I hereby certify that on the 26th day of January 2018, the following counsel of record have been served by electronic mail with a true and correct copy of the foregoing, including:

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